

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

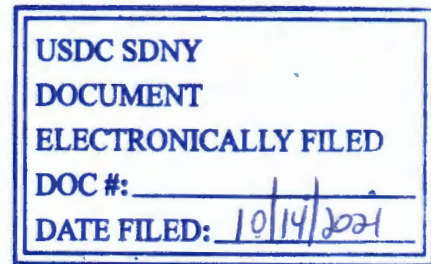
-----X  
MARIA NAVARRO CARRILO and  
JOSE GARZON, as Parents and Natural Guardians  
of M.G., and MARIA NAVARRO CARRILO and  
JOSE GARZON, Individually,

Plaintiffs,

-against-

MEISHA PORTER, in her official capacity as  
Chancellor of the New York City Department of  
Education, and The NEW YORK CITY  
DEPARTMENT OF EDUCATION,

Defendants.  
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CASE NO.: 20-cv-4639 (CM)

**NOTICE OF MOTION FOR  
RECONSIDERATION**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of Motion for Reconsideration, dated October 12, 2021, and all pleadings and prior proceedings herein, Plaintiffs will move, pursuant to Rule 59(e) of the Federal Rules of Civil Procedure, and Local Civil Rule 6.3, before the Honorable Colleen McMahon, United States District Judge, United States District Court for the Southern District of New York, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, on a date and time to be determined by the Court, for an Order:

- 1) Vacating this Court's Decision, dated September 10, 2021, and entered September 13, 2021, and issuing a Decision and Order granting the Plaintiffs' motion for summary judgment herein, and

MEMO ENDORSED

*10/14/2021*  
*Per my rules I have renewed this motion and deny it without requiring the City to respond. The motion is simply a restoration of arguments already considered and rejected, which is not the purpose of "Reconsideration."*  
*Colleen McMahon*  
*USD*

2) Granting such other and further relief as the Court deems just, proper and equitable.

Dated: October 12, 2021

Respectfully submitted,

/S: Peter G. Albert/

Peter G. Albert, Esq.  
Brain Injury Rights Group  
Attorneys for Plaintiffs  
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TO: Defendants' Counsel  
(via ECF)